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Public Comment Sought for Proposed Amendments to CMS Waiver Project Number (11-W-00289/5)

June 2, 2017

The Alabama Medicaid Agency is seeking public comment on its proposed amendments to the CMS approved 1115 Waiver Project Number (11-W-00289/5). The amendment requests the following modifications:

- Allow the Agency to phase-in the RCO program on a geographic basis; the phase-in is currently planned to begin on October 1, 2017 in Regions A and C and it is expected that RCOs will begin operations in Regions B, D, and E after October 1, 2017, but by October 1, 2018;
- Allow the Agency to operate only one RCO on a mandatory enrollment basis in both urban and rural areas;
- Clarify that if an American Indian chooses to opt into the demonstration, that individual will be subject to standard enrollment and disenrollment procedures until the next open enrollment period.
- Re-calculate overall budget neutrality fiscal impact to incorporate the regional phase-in of the RCO program. Calculation amendments includes:
 - Re-calculate the “with waiver” expenditure estimates to incorporate the regional phase-in of the RCO program as well as updated RCO capitation rate development.
 - Adjust the Designated State Health Program (DSHP) annual limits for demonstration year 1 and demonstration year 3; the total DSHP limit remains the same.
 - Adjust the Transition Pool annual limits; the total Transition Pool limit remains the same;
- Adjust the DSHP metrics to account for the phased-in approach to RCO implementation
- Provide authority for the Agency to distribute Transition Pool payments from demonstration year 1 through demonstration year 5, and allow unused Transition Pool funds to be carried over to the next demonstration year;
- Clarify that federal financial participation is available for reimbursement to RCOs from the RCO pool for approved start-up costs incurred after January 1, 2015;
- Clarify that the Integrated Provider System (IPS) program will be implemented on a phased-in basis, based upon when RCOs begin operations in each RCO region;
- Modify the IPS reporting timeframes and payment dates, and adjust the proportion of the total IPS award that is paid based on the approval of the IPS work plan; and,
- Not require the Agency to transition the managed care authority to a section 1932(a) state plan amendment or a 1915(b) waiver by the end of the demonstration.

A copy of the proposed changes can be found on the Alabama Medicaid Agency website by clicking [here](#).

The comment period is open until July 2, 2017. Written comments regarding the proposed waiver are welcome and should be submitted to: RCOportal@medicaid.alabama.gov or James Hartin, Office of General Counsel, Alabama Medicaid Agency, 501 Dexter Avenue, P.O. Box 5624, Montgomery, Alabama 36103-5624.